

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DROPBOX, INC.,

*Plaintiff/Counter-  
Defendant,*

v.

MOTION OFFENSE, LLC,

*Defendant/Counter-  
Plaintiff.*

Civil Action No.: 6:20-cv-00251-ADA

MOTION OFFENSE, LLC,

*Plaintiff,*

v.

DROPBOX, INC.,

*Defendant.*

Civil Action No.: 6:21-cv-758-ADA

**JOINT REPORT AND MOTION FOR ENTRY OF  
SECOND AMENDED SCHEDULING ORDER**

Pursuant to the Notice of Agreed Extension of Time to File the Report on Claim Narrowing (Civil Action No. 6:20-cv-00251-ADA, Doc. 109), Dropbox, Inc. (“Dropbox”) and Motion Offense LLC’s (“Motion Offense”) have conferred regarding narrowing the number of claims asserted and prior art references at issue and now file this Joint Report and Motion for Entry of the proposed Second Amended Scheduling Order filed herewith, which amends the Agreed Amended Scheduling Order entered by this Court on October 4, 2021 (Civil Action No. 6:20-cv-00251-ADA, Doc. 106) as follows:

Event	Current Schedule	Proposed Schedule
Motion Offense narrows to 25 claims	N/A	March 24, 2022

<b>Event</b>	<b>Current Schedule</b>	<b>Proposed Schedule</b>
Dropbox narrows to 35 combinations and 25 prior art references. Prior art relied upon by an expert only as evidence of the knowledge of a person of ordinary skill in the art does not count as a prior art reference. Multiple pieces of prior art evidence (for example, documents, source code, webpages, videos or any other forms of evidence) used as evidence relating to one prior art system counts as a single prior art reference. Motion Offense is not precluded from challenging the prior art status of any such evidence and/or seeking to exclude its use.	N/A	April 6, 2022
Last day for Motion Offense to serve discovery	N/A	April 8, 2022
Close of expert discovery	June 22, 2022	June 17, 2022
Motion Offense narrows to 15 claims	N/A	June 20, 2022
Dropbox narrows to 20 combinations and 15 prior art references. Prior art relied upon by an expert only as evidence of the knowledge of a person of ordinary skill in the art does not count as a prior art reference. Multiple pieces of prior art evidence (for example, documents, source code, webpages, videos or any other forms of evidence) used as evidence relating to one prior art system counts as a single prior art reference. Motion Offense is not precluded from challenging the prior art status of any such evidence and/or seeking to exclude its use.	N/A	June 30, 2022
Joint notice re remaining objections to disclosures/MIL disputes	September 1, 2023	September 1, 2022

Wherefore, Dropbox and Motion Offense respectfully pray for entry of the proposed Second Amended Scheduling Order attached hereto.

Dated: December 28, 2021

/s/ Timothy Devlin

Timothy Devlin (No. 4241)  
Derek Dahlgren (*pro hac vice*)  
Alex Chan (Texas Bar No. 24108051)  
Mariam Clayton (*pro hac vice*)  
DEVLIN LAW FIRM LLC  
1526 Gilpin Avenue  
Wilmington, Delaware 19806  
Tel: (302) 449-9010  
tdevlin@devlinlawfirm.com  
ddahlgren@devlinlawfirm.com  
achan@devlinlawfirm.com  
mclayton@devlinlawfirm.com

**Attorneys for Motion Offense, LLC**

/s/ J. Stephen Ravel

J. Stephen Ravel  
Texas State Bar No. 16584975  
KELLY HART & HALLMAN LLP  
303 Colorado, Suite 2000  
Austin, Texas 78701  
Tel: (512) 495-6429  
Email: steve.ravel@kellyhart.com

Gregory H. Lantier (*pro hac vice*)  
WILMER CUTLER PICKERING HALE  
& DORR LLP  
1875 Pennsylvania Avenue  
Washington DC 20006  
Tel: (202) 663-6327  
Email: gregory.lantier@wilmerhale.com

Liv Herriot (*pro hac vice*)  
WILMER CUTLER PICKERING HALE  
& DORR LLP  
2600 El Camino Real, Suite 400  
Palo Alto, CA 94306  
Tel: (650) 858-6138  
Email: liv.herriot@wilmerhale.com

**Attorneys for Dropbox, Inc.**

### **CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record are being served with a copy of the foregoing document via the Court's CM/ECF system on December 28, 2021.

/s/ J. Stephen Ravel

J. Stephen Ravel